

STATEMENT OF BASIS

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0102326
to discharge to waters of the State of Louisiana.
AI No.: 77346 / Activity No.: PER20070001

THE APPLICANT IS: Pilot Travel Centers, LLC
5508 Lonas Road
Knoxville, TN 37909

Facility
Pilot Travel Center #335
103 Grimshaw Street
Rayville, Richland Parish

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Bonnie Wascom

DATE PREPARED: June 6, 2008

1. PERMIT STATUS

- A. LPDES permit – LA0102326
LPDES permit effective date: June 1, 2003
LPDES permit expiration date: May 31, 2008
- B. LWDPS permit – NA
LWDPS permit effective date: NA
LWDPS permit expiration date: NA
- C. Date Application Received: November 29, 2007

2. FACILITY INFORMATION

- A. FACILITY TYPE/ACTIVITY – truck stop/service station/restaurant

This is an existing facility that is a retail self-service gasoline and diesel station. Stormwater runoff from the diesel fuel areas commingled with windshield wash water is directed to an oil/water separator and discharged to Dry Fork Creek via local Drainage, thence to Bee Bayou (080903). The sanitary wastewater from this facility is collected and treated by the Town of Rayville sewage treatment plant.

Statement of Basis for
Pilot Travel Centers, LLC
Pilot Travel Center #335
LA0102326 / AI 77346
Page 2

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: II
4. SIC code: 5541

C. LOCATION - 103 Grimshaw Street

Rayville, Richland Parish

Latitude +32° 27' 36", Longitude -91° 45' 33"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: stormwater runoff from diesel fueling areas commingled with windshield wash water

Treatment: oil/water separator

Location: at the point of discharge from the oil/water separator prior to mixing with other waters

Flow: 800 GPD

Discharge Route: by pipe to Dry Fork Creek via local drainage, thence to Bee Bayou

NOTE: Stormwater from this facility's SIC codes is not regulated under LAC 33:IX.2511.B.14. Based on review of Compliance History and DMRs since January 2003 it is determined that regulation of this facility's stormwater continues to be warranted under the provision of LAC 33:IX.2511.A.9. See items 7A and 7B below.

4. RECEIVING WATERS

STREAM – Outfall 001– by pipe to Dry Fork Creek via local drainage, thence to Bee Bayou

BASIN AND SEGMENT – Ouachita River – Subsegment 080903

DESIGNATED USES -

- a. Primary contact recreation
- b. Secondary contact recreation
- c. Propagation of fish and wildlife

Statement of Basis for
Pilot Travel Centers, LLC
Pilot Travel Center #335
LA0102326 / AI 77346
Page 3

5. EXISTING EFFLUENT LIMITS

1. **Outfall 001** – stormwater runoff from diesel fueling areas commingled with windshield wash water

<u>Pollutant</u>	<u>Limitation</u>	<u>Monitoring</u>
	Mo. Avg; Daily Max (mg/l)	
Flow (GPD)	-----: Report	Quarterly
TOC	-----: 50	Quarterly
Oil and Grease	-----: 15	Quarterly
pH	6.0 - 9.0 s.u.	Quarterly

6. PROPOSED EFFLUENT LIMITS

BASIS – See rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

Compliance Order number WE-C-95-0017 was issued on August 7, 1995 giving the facility interim limits for flow, oil and grease, COD, and TSS. The compliance order was amended on November 19, 1996. At this time interim limits were given for flow, TOC and oil and grease.

An inspection on October 18, 1999 noted that there was an oily sheen in the receiving water and oil was evident on the grass in the discharge ditch.

An inspection on July 9, 2002 noted no areas of concern.

An inspection on February 13, 2006 noted the three years of records, including but not limited to, the permit, the permit application, DMRs, sample analysis reports, SWPPP, and SPC/SPCC plan(s) were not presented or revealed. Also, SWPPP inspection documentation/annual reports were not presented or revealed.

An inspection on June 29, 2006 that was conducted in response to a complaint of fuel draining into a ditch noted no evidence of fuels in the ditch.

Statement of Basis for
Pilot Travel Centers, LLC
Pilot Travel Center #335
LA0102326 / AI 77346
Page 4

B. DMR Review/Excursions

Parameter	Flow (mgd)	pH	O&G (mg/l)	TOC (mg/l)	
Permit limit	Report	6.0 - 9.0	15	50	
1st Qtr 2003	0.0012	7.05	25	66.4	
2nd Qtr. 2003	0.0009	7.82	ND	20.9	
3rd Qtr. 2003	0.0009	8.41	7	55.2	
4th Qtr. 2003	0.0004	6.94	191	79.9	Not on file
1st Qtr 2004	0.0007	6.60	<5	1.78	Not on file
2nd Qtr. 2004	0.0004	7.25	39	68.7	Not on file
3rd Qtr. 2004	0.0006	6.92	9	27.1	Not on file
4th Qtr. 2004	0.0004	7.95	<5	8.05	Not on file
1st Qtr 2005	0.0006	6.70	<5	9.82	Not on file
2nd Qtr. 2005	0.0004	8.25	<5	66.6	Not on file
3rd Qtr. 2005	0.0003	7.91	<5	2.3	Not on file
4th Qtr. 2005	0.0004	6.60	<5	1.11	Not on file
1st Qtr 2006	0.0004	8.07	<5	23.2	Not on file
2nd Qtr. 2006	0.0003	6.55	<5	4.66	Not on file
3rd Qtr. 2006	0.0002	6.68	<5	2.38	Not on file
4th Qtr. 2006	0.0001	6.60	<5	73.5	Not on file
1st Qtr 2007	0.0004	6.60	<5	<1	Not on file
2nd Qtr. 2007	0.0003	6.48	<5	<1	Not on file
3rd Qtr. 2007	0.0004	7.40	7	12.2	Not on file
4th Qtr. 2007	0.0001	7.37	6	32.2	Not on file
1st Qtr. 2008					Not on file

For the period of January 2003- March 2008, 20 DMRs were reviewed. Of the 20 DMRs reviewed only 3 had been submitted to OEC in accordance with the reporting requirements in the permit. The remainder were obtained from the permittee by the permit writer during preparation of this reissuance permit. The review revealed 6 (30%) exceedances for the TOC parameter and 3 (15%) exceedances for the oil and grease parameter.

Statement of Basis for
Pilot Travel Centers, LLC
Pilot Travel Center #335
LA0102326 / AI 77346
Page 5

8. ENDANGERED SPECIES

The receiving waterbodies and proposed discharge are not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

9. 303 (d) LISTED WATERBODIES

Subsegment 080903, Big Creek – From headwaters to Boeuf River; includes Big Colewa Bayou, is not listed on LDEQ's Final 2006 303(d) list as impaired. However, subsegment 080903 was previously listed as impaired for Nitrate + Nitrite (as N), organic enrichment/low DO, suspended solids/turbidity/siltation and pesticides, for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 080903:

Ouachita TSS, Turbidity, and Siltation TMDL

Point sources do not represent a significant source of TSS as defined in this TMDL, and because effective policies are in place to limit TSS discharges, the discharge for this facility should not cause or contribute to the violation of water quality standards for TSS in the receiving stream. TSS will therefore not be limited in this permit.

Big Creek Oxygen Demand and Nutrients TMDL

It is unlikely that dischargers located on tributaries will impact the waterbody because of the distance from the dischargers to the waterbody. This facility is located on a tributary of Big Creek and therefore will not be limited to this permit.

Statement of Basis for
Pilot Travel Centers, LLC
Pilot Travel Center #335
LA0102326 / AI 77346
Page 6

Ouachita Pesticides TMDL

There are no known point sources for atrazine, carbofuran, DDT, methyl parathion or toxaphene in Big Creek, Bouef River, Joe's Bayou, Macon Bayou or the Tensas River watersheds; therefore, the WLA will be set to zero." The above listed pesticides are not known to be in this facility's discharge; therefore, they will not be limited in this permit.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation
Office of Environmental Services Public Notice Mailing List

Statement of Basis for
Pilot Travel Centers, LLC
Pilot Travel Center #335
LA0102326 / AI 77346
Page 7

Rationale for Pilot Travel Center #335

1. **Outfall 001** – stormwater runoff from diesel fueling areas commingled with windshield wash water

<u>Pollutant</u>	<u>Limitation</u>	<u>Reference</u>
	Mo. Avg: Daily Max	
Flow (GPD)	Report: Report	LAC 33:IX.2361.1.1.b
TOC	-----: 50	Similar discharges (BPJ)
Oil and Grease	-----: 15	Similar discharges (BPJ)
pH	6.0 - 9.0 s.u.	Similar discharges (BPJ)

Treatment: Oil/water separator

***Monitoring Frequency:** Once per quarter for all parameters at the point of discharge from the oil/water separator prior to mixing with other waters.

****Limits Justification:** For all parameters limits and monitoring frequencies are based on the previous permit effective on June 1, 2003 and permits for similar dischargers.

BPJ Best Professional Judgment
GPD Gallons per Day
s.u. Standard Units

NOTE:

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is included in the permit since there is a potential for storm water contamination from processes including vehicle fueling and windshield wash water.

The SWP3 shall be updated and maintained within sixty days from the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see narrative requirements of the Draft Permit).